

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

AUTHORS GUILD, DAVID BALDACCI, MARY BLY, MICHAEL CONNELLY, SYLVIA DAY, JONATHAN FRANZEN, JOHN GRISHAM, ELIN HILDERBRAND, CHRISTINA BAKER KLINE, MAYA SHANBHAG LANG, VICTOR LAVALLE, GEORGE R.R. MARTIN, JODI PICOULT, DOUGLAS PRESTON, ROXANA ROBINSON, GEORGE SAUNDERS, SCOTT TUROW, and RACHEL VAIL, individually and on behalf of others similarly situated,

Plaintiffs,

v.

OPENAI INC., OPENAI LP, OPENAI LLC, OPENAI GP LLC, OPENAI OPCO LLC, OPENAI GLOBAL LLC, OAI CORPORATION LLC, OPENAI HOLDINGS LLC, OPENAI STARTUP FUND I LP, OPENAI STARTUP FUND GP I LLC, and OPENAI STARTUP FUND MANAGEMENT LLC,

Defendants.

JONATHAN ALTER, KAI BIRD, TAYLOR BRANCH, RICH COHEN, EUGENE LINDEN, DANIEL OKRENT, JULIAN SANCTON, HAMPTON SIDES, STACY SCHIFF, JAMES SHAPIRO, JIA TOLENTINO, and SIMON WINCHESTER, on behalf of themselves and all others similarly situated,

Plaintiffs,

v.

OPENAI, INC., OPENAI GP, LLC, OPENAI, LLC, OPENAI OPCO LLC, OPENAI GLOBAL LCC, OAI CORPORATION, LLC, OPENAI HOLDINGS, LLC, and MICROSOFT CORPORATION,

Defendants.

CONSOLIDATED CASES:

No. 1:23-cv-08292-SHS

No. 1:23-cv-10211-SHS

No. 1:24-cv-00084-SHS

NICHOLAS A. BASBANES and NICHOLAS
NGAGOYEANS (professionally known as Nicholas
Gage), individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

MICROSOFT CORPORATION, OPENAI, INC.,
OPENAI GP, LLC, OPENAI HOLDINGS, LLC,
OAI CORPORATION, LLC, OPENAI GLOBAL,
LLC, OPENAI, LLC, and OPENAI OPCO LLC,

Defendants.

**AFFIDAVIT OF CAROLYN M. HOMER IN SUPPORT OF MOTION FOR ADMISSION
*PRO HAC VICE***

I, Carolyn M. Homer, declare as follows:

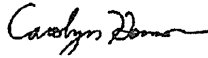
1. I am an attorney at law licensed to practice in the Washington, the District of Columbia. I submit this Affidavit in support of the motion to admit me pro hac vice before the United States District Court for the Southern District of New York to represent Defendants OpenAI Inc., OpenAI LLC, OpenAI GP LLC, OpenAI OpCo LLC, OpenAI Global LLC, OAI Corporation LLC, OpenAI Holdings LLC, OpenAI Startup Fund I LP, OpenAI Startup Fund GP I LLC, and OpenAI Startup Fund Management LLC in the above-captioned action.
2. I am a member in good standing of the bar of the state of California. A true copy of my certificate of good standing issued by the Bar of the State of California as well as a true

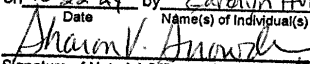
copy of my certificate of good standing issued by the Bar of the District of Columbia within the past 30 days is attached hereto:

3. Pursuant to Local Rule 1.3(c), I state:
 - a. I have never been convicted of a felony;
 - b. I have never been censured, suspended, disbarred or denied admission or readmission by any court; and
4. There are no disciplinary proceedings presently against me; and
5. I have read and am familiar with the provisions of the Judicial Code (Title 28 U.S.C.), the Federal Rules of Civil Procedure, the Federal Rules of Criminal Procedure, the Federal Rules of Evidence, the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, and the New York Rules of Professional Conduct.
4. I will faithfully adhere to all rules applicable to conduct in connection with any activities in this Court.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: October 22, 2024


Carolyn M. Homer

District of Columbia
Signed and sworn to (or affirmed) before me
on 10-22-24 by Carolyn Homer
Date Name(s) of Individual(s) making Statement

Signature of Notarial Officer Sharon V. Snowden
Notary for the District of Columbia
Title of Office
My commission expires: August 14, 2028

